

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation
and Administration of the California Renewables Portfolio
Standard Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

**DECISION GRANTING COMPENSATION TO L. JAN REID FOR SUBSTANTIAL
CONTRIBUTION TO DECISIONS D.13-11-024, D.14-11-042 AND D.14-12-081**

Intervenor: L. Jan Reid	For contribution to Decisions (D.) 13-11-024, D.14-11-042 and D.14-12-081
Claimed: \$35,440.08	Awarded: \$34,687.58 (reduced 2.1%)
Assigned Commissioner: Carla J. Peterman	Assigned Administrative Law Judge (ALJ): Anne E. Simon

PART I: PROCEDURAL ISSUES

A. Brief description of Decisions:	<p>D.13-11-024 conditionally accepted, as modified, the draft 2013 Renewables Portfolio Standard (RPS) Procurement Plans, including the related solicitation protocols, filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).</p> <p>D.14-11-042 conditionally accepted, as modified, the draft 2014 Renewables Portfolio Standard (RPS) Procurement Plans, including the related solicitation protocols, filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).</p> <p>D.14-12-081 implemented the provisions of Senate Bill 1122 (Rubio), stats. 2012, ch. 612.</p>
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**Intervenor must satisfy intervenor compensation requirements set forth in
Pub. Util. Code §§ 1801-1812:**

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	July 11, 2011	Verified.
2. Other specified date for NOI:		
3. Date NOI filed:	July 5, 2011	Verified.
4. Was the NOI timely filed? Yes		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	D.11-03-019, Conclusion of Law 1, slip op. at 16.	Verified.
8. Has the Intervenor demonstrated customer or customer-related status?		Yes.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	D.11-03-019, slip op. at 6, and D.11-03-019, Conclusion of Law 1, slip op. at 16	Verified.
12. Has the Intervenor demonstrated significant financial hardship?		Yes.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	N/A <i>See comment below.</i>	D.14-12-081
14. Date of issuance of Final Order or Decision:	N/A	December 26, 2014
15. File date of compensation request:	February 19, 2015	February 20, 2015
16. Was the request for compensation timely?		Yes.

Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
13,14	A final decision closing proceeding R.11-05-005 has not been issued. Therefore, the request is timely pursuant to Public Utilities Code § 1804(c).	
16	<p>This request is timely under PU Code §1804(c) because of a standard previously established in D.14-06-024. In its decision on a compensation request filed by Reid, the Commission stated that: (D.14-06-024, slip op. at 2)</p> <p>“A final decision closing proceeding R.10-05-006 has not been issued. Therefore, the request is timely pursuant to Public Utilities Code § 1804(c).”</p> <p>The Commission should apply the same standard to the instant request by finding that Reid’s request is timely under PU Code §1804(c).</p>	

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
D.13-11-024		
1. Imperial Valley Preferences	<p>The Commission has stated that “L. Jan Reid (Reid) opposes any preferences and states that preferences are unnecessary.” (D.13-11-024, slip op. at 13)</p> <p>In response to a series of proposals put forth by Tenaska Solar Ventures, Reid argued that: (Reply Comments of L. Jan Reid on RPS Plans, at 6-8)</p>	Yes.

	<p>“Each of these “remedial measures” may be counterproductive, give preference to Imperial Valley developers, and discriminate against developers in other areas of the state. The Commission should reject all of these proposals in the instant rulemaking. These proposals are unnecessary, inconsistent with Public Utilities Code Section (Pub. Util.) 399.14(c)(B), §451, and §454, and send the wrong message to renewables developers in other parts of the state.”</p> <p>The Commission effectively agreed with Reid when it stated that “We decline, however, to adopt the requests for additional oversight mechanisms based on, among other things, the continued robust procurement in the area, as indicated by the amount of capacity currently under contract in the Imperial Valley region and the robust interest for project development based on the results of prior solicitations and the Independent Evaluator’s report.” (D.13-11-024, slip op. at 14)</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Imperial Valley Preferences issue.</p>	
2. Production Tax Credits (PTC)	<p>The California Wind Energy Association (CWEA) recommended that “the Commission should direct PG&E to compensate the seller for the after-tax value of PTC for energy that would have been generated but for the buyer-directed curtailment.” CWEA Plan Comments, at 4)</p> <p>Reid argued that the Commission should reject CWEA’s proposal for the reasons given on pages 2-3 of Reid’s RPS Plan Reply Comments.</p> <p>The Commission agreed with Reid</p>	<p>Yes, however the Commission decided not to adopt CWEA’s recommendations mainly because it found them unpersuasive compared to the Commission’s position as stated in D.11-4-030.</p>

	<p>when it stated that “We also clarify that the utilities are not required to compensate sellers for the loss of production tax credits due to curtailment.”(D.13-11-024, slip op. at 38)</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the PTC issue.</p>	
3. Over Procurement	<p>Both the Green Power Institute (GPI) and the Union of Concerned Scientists (UCS) proposed that the Commission establish an over-procurement margin. Reid urged the Commission to reject the GPI and UCS proposals. (<i>See Reid RPS Plan Reply Comments</i>, at 3-6)</p> <p>Reid pointed out that “The IOUs are responsible for meeting their RPS targets and therefore should have the flexibility to determine the appropriate level of cost-effective over procurement, subject to Commission approval.” (<i>Reid RPS Plan Reply Comments</i>, at 4)</p> <p>UCS incorrectly stated that “Retail sellers are specifically required to over-procure to compensate for foreseeable delays or insufficient supply.” (<i>UCS RPS Plan Comments</i>, at 3)</p> <p>The Commission has an over-procurement margin of 0%.</p> <p>Reid pointed out that Pub. Util. Code § 399.13(a)(4)(D) “allows, but does not require, an electrical corporation to establish an over procurement margin which is higher than the margin established by the Commission.” (<i>Reid RPS Plan Reply Comments</i>, at 5)</p> <p>The Commission did not adopt either of the over-procurement recommendations of the GPI and UCS.</p> <p>Thus, Reid made a substantial</p>	Verified.

	contribution to the Commission's resolution of the Over Procurement issue.	
4. Minor Errors	<p>Reid pointed out that: (Reid PD Comments, November 4, 2013, at 3)</p> <p>"Footnote 31 (PD, at 13) cites 'Reid July 12, 2013 comments at 6-8.' Reid did not file comments on July 12, 2013. Rather, Reid filed reply comments on July 22, 2013. The corrected citation should read 'Reid July 22, 2013 reply comments at 6-8.' "</p> <p>The citation was corrected in the final version of D.13-11-024.</p>	Verified, but not a substantial contribution.
5. Price Projections	<p>Calpine argued that "demand will shift from peak to non-peak hours as the concentration of Solar PV increases." (Calpine PD Comments, at 3)</p> <p>Reid effectively rebutted Calpine's recommendation by pointing out that: (Reid PD Reply Comments, November 12, 2013, at 2)</p> <p>"Calpine also incorrectly argues that the capacity value of solar PV will decline as penetration increases. Calpine confuses the theoretical value of capacity with the market value of capacity. The Commission has traditionally relied on the market value of capacity as a benchmark, instead of the theoretical value of capacity."</p> <p>Reid recommended that the "Commission should continue its past practice and reject Calpine's recommendation concerning energy and capacity values." (Reid PD Reply Comments, at 1)</p> <p>The Commission did not adopt Calpine's recommendation concerning energy and capacity values. Thus, Reid made a substantial contribution to the Commission's resolution of the Price</p>	Yes.

	Projections issue.	
6. Curtailment	<p>Calpine recommended that “Accordingly, the Proposed Decision should be revised to expressly prohibit an IOU from considering unlimited curtailment as a threshold criterion or qualitative factor in the bid evaluation process.” (Calpine PD Comments, at 5)</p> <p>Reid urged the Commission to reject Calpine’s recommendation and argued that: (Reid PD Reply Comments)</p> <p>“Curtailment has a positive value and the Commission should not prevent the IOU’s from incorporating this value into their modeling process. All other things being equal, a contract which offers unlimited curtailment is more valuable than a contract which does not.” (Reid PD Reply Comments, at 3)</p> <p>The Commission effectively agreed with Reid when it stated that: (D.13-11-024, slip op. at 39)</p> <p>“Nevertheless, we recognize the possibility that buyer curtailment in the RPS context may create additional operational flexibility. We also acknowledge that parties may negotiate the terms of their contracts and may ultimately agree to a curtailment term that grants permission for greater or lesser curtailment events.”</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Curtailment issue.</p>	Yes
D.14-11-042		
7. Resource Diversity	<p>GPI effectively recommended a separate RPS requirement for each technology. (GPI PD Comments, at 4)</p> <p>Reid urged the Commission to reject GPI’s recommendation and argued that: (Reid PD Reply Comments, at 3-4)</p>	Yes

	<p>“Some renewable developers have long argued for a RPS requirement for each renewable technology. This is inconsistent with state law. For example, Pub. Util. Code § 399.20(d)(2)(C) states that the Commission must consider ‘The value of different electricity products including baseload, peaking, and as available electricity.’ The statute does not require the Commission to set a separate requirement for each renewable technology.”</p> <p>The Commission did not adopt GPI’s recommendation regarding resource diversity. Thus, Reid made a substantial contribution to the Commission’s resolution of the Resource Diversity issue.</p>	
8. Expired PTC	<p>The Commission stated that “As for whether the provisions should be modified to include compensation for production tax credits, we agree with Reid, that circumstances have not significantly changed from when we first addressed this issue. As such, the utilities are not required to compensate the seller for production tax credits that would have been received if generation were not economically curtailed.” (D.14-11-042, slip op. at 44)</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Expired PTC issue.</p>	Yes
9. Resource Adequacy	<p>Calpine argued that “Planning reserve margin projections will decrease once they reflect the application of the ELCC methodology to solar resources.” (Calpine Comments, at 3)</p> <p>Reid argued that “Since the Commission has not adopted an ELCC methodology, the Commission should not assume that</p>	Yes

	<p>the planning reserve margin projections will decline as recommended by Calpine.” (Reid Reply Comments, at 15)</p> <p>The Commission did not adopt Calpine’s recommendation concerning planning reserve margins.</p> <p>CalWEA recommended that “If a zero capacity value is not adopted for 2014, however, then the Commission should direct the utilities to use the ELCC values already in use at the Commission for application in 2014 RPS bid evaluations.” (CalWEA Comments, at 11)</p> <p>Reid opposed CalWEA’s recommendation and argued that “the Commission has not adopted an ELCC methodology, and I am unaware of any ELCC values that have been officially endorsed by the Commission.”</p> <p>The Commission stated that: (D.14-11-042, slip op. at 52)</p> <p>“Further, while ELCC values are being developed by the Commission, the Commission has yet to adopt such values. For this reason, we agree with Reid that CalWEA’s suggestion to use ELCC to value resource adequacy should not be adopted at this time.”</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Resource Adequacy issue.</p>	
10. Energy Division Questions	<p>On July 21, 2014, Jason Simon of the CPUC’s Energy Division sent an email to parties requesting that the parties’ reply comments include a response to a series of six questions.</p> <p>Reid responded to the Energy Division request on pages 3-12 of Reid’s July 30, 2014 reply comments.</p> <p>The Commission should continue its</p>	Yes

	practice of fully compensating Reid for time spent answering the Energy Division's questions.	
11. Renewable Integration	<p>Bright Source Energy (BSE) argued that "The Commission's goal should therefore be to develop an integration adder methodology that is simpler, more intuitive and easier to implement than the alternatives, such that it can be implemented in a shorter time frame." (BSE Comments, at 1-2)</p> <p>Reid argued that: (Reid Reply Comments, July 30, 2014, at 13).</p> <p>"Therefore, it is important that the renewable integration adder be as accurate as possible. There can be no doubt that quantitative modeling combined with parties' comments and suggestions are superior to the analytically limited process suggested by BSE."</p> <p>The Commission did not adopt BSE's recommendation.</p> <p>PG&E recommended that "the Commission's final decision on the 2014 RPS procurement plans adopt an interim RICA [Renewable Integration Cost Adder] based on publicly-available data on integration costs throughout the Western Electricity Coordinating Council ('WECC') region." (PG&E Comments, at 6)</p> <p>Reid opposed PG&E's recommendation. (See Reid Reply Comments, July 30, 2014, at 17-18)</p> <p>The Commission adopted PG&E's recommendation and stated that "We find that PG&E presents a reasonable approach for use on an interim basis." (D.14-11-042, at 63)</p> <p>Although the Commission did not adopt Reid's recommendation, Reid made a</p>	Yes

	substantial contribution to the Commission's resolution of the Renewable Integration issue.	
12. Operational Flexibility	<p>The PD stated that "We are aware that increases in intermittent renewable generation require the grid system to be more operationally flexible to ensure adequate system reliability." (PD, at 53)</p> <p>Reid recommended that this sentence be deleted from the PD for the following reasons: (Reid PD Comments, November 10, 2014, at 4.)</p> <ol style="list-style-type: none"> 1. There is no record evidence which supports the PD's statement. 2. The PD fails to provide a reference to a Commission decision which justifies this statement. 3. The PD does not find that increases in intermittent renewable generation require the grid system to be more operationally flexible to ensure adequate system reliability. <p>The Commission's language was changed to state that "Increases in intermittent renewable generation may require the grid system to be more operationally flexible to ensure adequate system reliability." (D.14-11-042, slip op. at 54)</p> <p>Thus, the Commission has effectively allowed operational flexibility to be litigated in R.11-05-005 or in other proceedings.</p> <p>Therefore, Reid made a substantial contribution to the Commission's resolution of the operational flexibility issue.</p>	Yes
13. Minor Errors	<p>Reid argued that the meaning of Finding of Fact (FOF) 33 is unclear and contains grammatical errors. (Reid PD Comments, November 10, 2014, at 7)</p> <p>The Commission modified FOF 33 as</p>	Yes

	<p>recommended by Reid.</p> <p>Reid also recommended that the Commission modify the PD and explain the meaning of Tier I, Tier II, and Tier III advice letters. (Reid PD Comments, November 10, 2014, at 7)</p> <p>The Commission provided an explanation of advice letters by referring the public to General Order 96-B. (<i>See</i> D.14-11-042, footnote 54, slip op. at 27)</p>	
D.14-12-081		
14. Fuel Source	<p>Reid argued that: (Reid Comments, December 20, 2013, at 15)</p> <p>“The Commission should not restrict feedstock sources to the service territory of the contracting utility. Such a restriction would make it difficult for the IOUs to meet the requirements of SB 1122 and would disadvantage otherwise qualified SB 1122 projects.”</p> <p>The Commission decided that “The suggestion to restrict the location of fuel sources is rejected.” (D.14-12-081, slip op. at 46)</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Fuel Source issue.</p>	Yes
15. Market Power	<p>Staff proposed that “Projects which are eligible to seek a FIT (Feed In Tariff) contract pursuant to SB 1122 may not seek a contract pursuant to the baseload, peaking, or as available categories of the FIT.” (Staff Proposal, at 11)</p> <p>Reid opposed this portion of the Staff Proposal. (<i>See</i> Reid Comments, December 20, 2013, at 1-2)</p> <p>Although the Commission did not agree with Reid’s recommendation on this issue, Reid made a substantial</p>	No substantial contribution. Reid’s opposition was based on an incorrect application of Pub. Util. Code § 453(a).

	ontribution to the Commission's resolution of the Market Power issue.	
16. Program Administration	<p>The November 19, 2013 Ruling (Ruling) requested that parties who oppose the Staff Proposal "describe how participation in the tariffs could be administered to minimize the risk that participation of SB 1122-eligible projects would increase prices under the general ReMAT tariffs." (Ruling, at 4)</p> <p>Reid argued that "There is no administrative problem because there is little risk that SB 1122 projects will increase the general ReMAT price." (Reid Comments, December 20, 2013, at 2)</p> <p>Reid provided a detailed explanation of his statements on pages 2-3 of Reid's comments.</p> <p>Thus, Reid made a substantial contribution to the Commission's resolution of the Program Administration issue.</p>	Yes
17. Commercial Operations Date (COD)	<p>Reid argued that "I recommend that the Commission use the CEC's definition of COD because its meaning is commonly understood, the definition is reasonable, and the definition comes from an authoritative and well-established source (the CEC)." (Reid Comments, December 20, 2013, at 5)</p> <p>The Commission stated that "Because the CEC definitions are widely understood and applied within the renewable energy industry, it is reasonable to adopt the CEC's definition, with the clarification that the definition that controls is the definition in the Eligibility Guidebook that is in effect on the date that a generation facility submits its request for participation in the bioenergy FiT." (D.14-12-081, slip op. at 43-44)</p>	Yes, but duplicative of other parties.

	Thus, Reid made a substantial contribution to the Commission's resolution of the COD issue.	
18. Allocation	<p>Reid opposed the proposed Staff Allocation by Category. Reid argued that: (Reid Comments, December 20, 2013, at 6)</p> <p>"The revised staff allocation is unnecessary. There is no statutory requirement that an IOU's biogen procurement be limited to the IOU's service territory. An IOU can sign a procurement contract in another IOU's service territory and then sell the contract or the energy, trade the contract for a more desirable contract, or move the energy into their service territory."</p> <p>The Commission stated that "This makes the issue of how the MW targets for each technology category should be allocated somewhat more complicated than the simple statutory directives would suggest." (D.14-12-081, slip op. at 37)</p> <p>Thus, Reid made a substantial contribution to the Commission's resolution of the Allocation issue.</p>	Yes, however Reid's proposed allocations were not adopted.
19. Monitoring	<p>Reid stated that: (Reid Comments, December 20, 2013, at 8)</p> <p>I disagree with Staff that this review should be performed by the IOU because this would essentially transfer regulatory authority from the Commission to the IOUs. Although the IOUs are well qualified to perform certain due diligence functions (<i>see</i> Section IV.F.2 above), the IOUs are not regulators and should not be thrust into a regulatory role by the Commission."</p> <p>The Commission effectively agreed with Reid when it stated that "The Commission, the IOUs, and the market</p>	Yes.

	<p>participants do not have enough experience with the types of small bioenergy projects mandated by SB 1122 to make definitive choices about monitoring by third parties.” (D.14-12-081, slip op. at 34-35)</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Monitoring issue.</p>	
20. Starting Price	<p>Reid stated that “I recommend that the ReMat starting price be set at \$92.46/MWh for Existing Digestion projects and at \$124.66/MWh for all other projects. I base my recommendation on the average FIT price paid to the two digestion projects shown in Table 4-8 of the Black and Veatch report.” (Reid Comments, December 20, 2013, at 10)</p> <p>Although the Commission did not agree with Reid on this issue, Reid made a substantial contribution to the Commission’s resolution of the Starting Price issue.</p>	Yes.

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified.
c. If so, provide name of other parties: AECA, Farm Bureau, Forest Trust, PG&E, SCE, SDG&E, BAC, Sustainable Conservation, and Placer APCD. (See Section Part II.D)		Verified.
d. Intervenor’s claim of non-duplication: Reid collaborated with a number of parties during the course of this proceeding. Although Reid does not seek compensation for all of these communications, they indicate reasonable		Verified.

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

collaboration with other parties.	
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C. Additional Comments on Part II:

Item	Intervenor's Comment	CPUC Discussion
A. 1-7	These items address Reid's claim of substantial contribution to D.13-11-024.	
A. 8-13	These items address Reid's claim of substantial contribution to D.14-11-042.	
A. 14-20	These items address Reid's claim of substantial contribution to D.14-12-081.	
C.c	<p>Of the 20 issues identified by Reid in Part II.A above, the Commission did not identify any party whose position was similar to Reid's on more than two issues. Thus, the Commission can safely find that Reid did not duplicate the work of other parties.</p> <p>Reid's compensation in this proceeding should not be reduced for any duplication with respect to the showings of other parties. In a proceeding with subject matter as complex as in this one and with multiple parties, it is virtually impossible for Reid or any party to fully anticipate where showings of other parties may duplicate Reid's, especially in view of the need to make a coherent and sufficient showing on the issues Reid emphasizes and on the ultimate issues.</p> <p>In evaluating Reid's claim and the issue of duplication, the Commission should be guided by the standards established in D. 03-03-031</p> <p>In this decision, the Commission stated that: (Westlaw 2003 WL 1715098, Cal P.U.C., D.03-03-031, slip op. at 1)</p>	

	<p>“We have concluded that the application of a duplication penalty to reduce awards to participants that make a substantial contribution is not permissible under the statutes governing compensation of participating customers in commission proceedings.”</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Concise explanation as to how the cost of Claimant’s participation bears a reasonable relationship with benefits realized through participation.	CPUC Discussion
<p>Reid contributed to the proceeding in a manner that was productive and will result in benefits to ratepayers that exceed the cost of Reid’s participation.</p> <p>In consolidated Rulemaking 97-01-009 and Investigation 97-01-010, the Commission required intervenors seeking compensation to show that they represent interests that would otherwise be underrepresented and to present information sufficient to justify a finding that the overall benefits of a customer's participation will exceed the customer's costs. (D.98-04-059, 79 CPUC2d 628, Finding of Fact 13 at 674, Finding of Fact 42 at 676) The Commission noted that assigning a dollar value to intangible benefits may be difficult.</p> <p>As mentioned previously, Reid made a substantial contribution to the proceeding. It is reasonable to assume that the resolution of the issues raised by Reid in this proceeding will benefit ratepayers in the future.</p> <p>As mentioned previously, Reid opposed the suggestion of other parties that IOUs compensate suppliers for the loss of production tax credits.</p> <p>If the Commission had ordered the IOUs to compensate suppliers for the loss of production cost credits, and this had resulted in an increase of just \$2/megawatt hour (MWh) for renewable facilities that produced 100 gigawatt hours (GWh) of electricity annually, ratepayers would have paid an additional \$200,000 annually—more than five times the compensation that Reid has requested in this proceeding.</p> <p>The Commission can safely find that the participation of Reid in this proceeding was productive. Overall, the benefits of Reid’s participation justify compensation in the amount requested.</p>	<p>Verified.</p>

<p>b. Reasonableness of Hours Claimed.</p> <p>All of Reid’s work in this proceeding was performed by L. Jan Reid. Thus, no unnecessary internal duplication took place.</p> <p>In this pleading, Reid requests compensation in the total amount of \$35,440.08 for time reasonably devoted to the instant rulemaking. A more detailed breakdown of the time devoted to this proceeding by Reid is provided in Attachment A to this pleading.</p> <p>Reid’s work was performed efficiently. L. Jan Reid is a former Commission employee who has testified on many occasions on issues such as long term procurement plans, renewables procurement, cost-of-capital, utility finance, and electricity and natural gas procurement issues.</p> <p>Daily listings of the specific tasks performed by Reid in connection with this proceeding are available in Attachment A to this pleading. The cost listings demonstrate that the hours claimed are reasonable given the scope and timeframe of this part of the instant rulemaking.</p> <p>No compensation for administrative time is requested, in accordance with Commission practice. (D.99-06-002, discussion, slip op. at 8-10). I understand that the Commission may audit my books and records to the extent necessary to verify the basis for any award, pursuant to Pub.Util. Code § 1804(d).</p>	<p>Verified.</p>																																																												
<p>c. Allocation of hours by issue:</p> <table><tr><th>Issue</th><th>Hours</th><th>Percent</th></tr><tr><td>Allocation</td><td>4.50</td><td>2.89%</td></tr><tr><td>Commercial Operation Date</td><td>1.50</td><td>0.96%</td></tr><tr><td>Curtailment</td><td>1.90</td><td>1.22%</td></tr><tr><td>Energy Division Questions</td><td>16.50</td><td>10.58%</td></tr><tr><td>Fuel Source</td><td>3.00</td><td>1.92%</td></tr><tr><td>Imperial Valley Preferences</td><td>5.80</td><td>3.72%</td></tr><tr><td>Market Power</td><td>3.00</td><td>1.92%</td></tr><tr><td>Monitoring</td><td>1.50</td><td>0.96%</td></tr><tr><td>Operational Flexibility</td><td>2.50</td><td>1.60%</td></tr><tr><td>Over Procurement</td><td>11.70</td><td>7.50%</td></tr><tr><td>Price Projections</td><td>1.90</td><td>1.22%</td></tr><tr><td>Production Tax Credits</td><td>8.20</td><td>5.26%</td></tr><tr><td>Program Administration</td><td>4.50</td><td>2.89%</td></tr><tr><td>Renewable Integration</td><td>20.60</td><td>13.21%</td></tr><tr><td>Resource Adequacy</td><td>7.10</td><td>4.55%</td></tr><tr><td>Resource Diversity</td><td>1.80</td><td>1.15%</td></tr><tr><td>Starting Price</td><td>3.00</td><td>1.92%</td></tr><tr><td>General</td><td>54.90</td><td>35.21%</td></tr><tr><td>Minor Errors</td><td>2.00</td><td>1.28%</td></tr></table>	Issue	Hours	Percent	Allocation	4.50	2.89%	Commercial Operation Date	1.50	0.96%	Curtailment	1.90	1.22%	Energy Division Questions	16.50	10.58%	Fuel Source	3.00	1.92%	Imperial Valley Preferences	5.80	3.72%	Market Power	3.00	1.92%	Monitoring	1.50	0.96%	Operational Flexibility	2.50	1.60%	Over Procurement	11.70	7.50%	Price Projections	1.90	1.22%	Production Tax Credits	8.20	5.26%	Program Administration	4.50	2.89%	Renewable Integration	20.60	13.21%	Resource Adequacy	7.10	4.55%	Resource Diversity	1.80	1.15%	Starting Price	3.00	1.92%	General	54.90	35.21%	Minor Errors	2.00	1.28%	<p>Verified; however reductions have been made as discussed below.</p>
Issue	Hours	Percent																																																											
Allocation	4.50	2.89%																																																											
Commercial Operation Date	1.50	0.96%																																																											
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Market Power	3.00	1.92%																																																											
Monitoring	1.50	0.96%																																																											
Operational Flexibility	2.50	1.60%																																																											
Over Procurement	11.70	7.50%																																																											
Price Projections	1.90	1.22%																																																											
Production Tax Credits	8.20	5.26%																																																											
Program Administration	4.50	2.89%																																																											
Renewable Integration	20.60	13.21%																																																											
Resource Adequacy	7.10	4.55%																																																											
Resource Diversity	1.80	1.15%																																																											
Starting Price	3.00	1.92%																																																											
General	54.90	35.21%																																																											
Minor Errors	2.00	1.28%																																																											

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
L. Jan Reid, Expert and Advocate	2013	76.7	215	D.14-12-072, Appendix	16,490.50	73.2 ^[A]	\$215.00 ²	\$15,738.00
L. Jan Reid, Expert and Advocate	2014	79.2	220	Resolution ALJ-303	17,424.00	79.2	\$220.00 ³	\$17,424.00
Subtotal: \$33,914.50						Subtotal: \$33,162.00		

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
L. Jan Reid	2015	13.4	110.00	D.14-12-072, Appendix and Resolution ALJ-303	1,474.00	13.4	\$110.00	\$1,474.00
Subtotal: \$1,474.00						Subtotal: \$1,474.00		
COSTS								
#	Item	Detail			Amount	Amount		
1	2013 Postage	Postage on 3 large envelopes for 3 separate filings			7.31	\$7.31		
2	2013 Copying	170 pages at 8 cents/page			13.60	\$13.60		
3	2014 Postage	Postage on 3 large envelopes for 3 separate filings			5.91	\$5.91		
4	2014 Copying	163 pages at 8 cents/page			13.04	\$13.04		
	2015 Postage	Postage for 1 large envelope.			3.24	\$3.24		
	2015 Copying	106 pages at 8 cents/page			8.48	\$8.48		
TOTAL REQUEST: \$35,440.08						TOTAL AWARD:\$34,687.58		

*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

² Approved in D. 14-12-072.

³ Application of 2.58% Cost of Living Adjustment to 2013 rate.

****Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate**

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Service List
3	Attachment A: A daily listing of the work performed by Reid
4	<p>Reid's Hourly Rate</p> <p>Reid requests that the Commission authorize an hourly rate of \$215 for L. Jan Reid for 2013 professional work, and \$220 for 2014 and 2015 professional work. Reid also requests an hourly rate for L. Jan Reid of \$107.50 for 2013 compensatory time, and \$110.00 for 2014-2015 compensatory time.</p> <p>As discussed in Part III.B, the Commission set Reid's hourly rate at \$215 for 2013 professional work. The Commission has ordered that "For work performed in the 2014 calendar year, intervenors are authorized a 2.58 percent cost-of-living adjustment." (Resolution ALJ-303, Ordering Paragraph 1, slip op. at 9)</p> <p>The Commission had previously set Reid's hourly rate for 2013 work at \$215/hr. (<i>See</i> D.14-12-072, Appendix). 2.58 percent of \$215 is \$5.57, which rounds to a rate increase of \$5/hr. for 2014 and 2015 work. Thus, Reid's hourly rate for 2014 and 2015 work should be set at \$220/hr. ($215 + 5 = 220$)</p>

D. CPUC Disallowances and Adjustments:

Item	Reason
A	Reduction of 0.5 hours to 2013 hours for time spent on minor errors. Reduction of 3 hours for non-substantial contribution to issue of market power.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. L. Jan Reid has made a substantial contribution to Decision (D.) 13-11-024, D.14-11-042, and D.14-12-081.
2. The requested hourly rates for L. Jan Reid, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$34,687.58

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. L. Jan Reid shall be awarded \$34,687.58.
2. Within 30 days of the effective date of this decision Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall pay L. Jan Reid their respective shares of the award, based on their California-jurisdictional, electric revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 2, 2015, the 75th day after the filing of L. Jan Reid's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, 2015 at Sacramento, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.13-11-024, D.14-11-042, D.14-12-081		
Proceeding(s):	R1105005		
Author:	ALJ Simon		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
L. Jan Reid	February 20, 2015	\$35,440.08	\$34,687.58	N/A	Reductions for non-substantial contribution

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
L. Jan	Reid	Expert	L. Jan Reid	\$215.00	2013	\$215.00
L. Jan	Reid	Expert	L. Jan Reid	\$220.00	2014	\$220.00

(END OF APPENDIX)